

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
WORCESTER DIVISION

SANDRA S. KATZ,
Plaintiff

v.

DONNA LEE H. WILLIAMS, INSURANCE
COMMISSIONER OF THE STATE OF
DELAWARE AS RECEIVER OF NATIONAL
HERITAGE LIFE INSURANCE COMPANY
IN LIQUIDATION,
Defendant and
Third Party Plaintiff,

v.

FEDERAL DEPOSIT INSURANCE CORPORATION;
UNITED STATES OF AMERICA;
E. PERRY KING;
ALAN MASON;
ALAN MASON LEGAL SERVICES, P.C.;
ALAN MASON LEGAL SERVICES, INC.,
ALAN MASON d/b/a
ALAN MASON LEGAL SERVICES, P.C.;
ALAN MASON d/b/a
ALAN MASON LEGAL SERVICES, INC.;
and
ALAN MASON LEGAL SERVICES, P.C. d/b/a
ALAN MASON LEGAL SERVICES, INC.,
Third Party Defendants.

CIVIL ACTION
NO. 05-40014-FDS

ASSENTED-T0 MOTION TO FILE REPLY BRIEF

Defendant United States request that this Court permit it to file a Reply Brief to Matthew Denn, Insurance Commissioner of the State of Delaware Opposition to United States' Motion to Dismiss. Denn's Opposition raises several complicated issues, and the United States requests extra time to address these issues thoroughly.

Defendant requests that it be permitted to file its Reply on or before June 3, 2005.

Counsel for Matthew Denn kindly assents to this Motion.

Respectfully submitted,

MICHAEL J. SULLIVAN,
United States Attorney

BY: /s/Anita Johnson
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CERTIFICATE OF SERVICE AND RULE 7.1 CONFERENCE

I certify that the foregoing has been served upon counsel of record by first class mail, postage prepaid, and that I conferred with counsel for Matthew Denn, James F. Creed, Jr., 1329 Highland Avenue, Needham, Mass. 02492, and he assents to this Motion, both on this 18th day of May, 2005.

/s/Anita Johnson